

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:20-cr-183

vs.

Hon. Robert J. Jonker
Chief United States District Judge

DANIEL JOSEPH HARRIS,
Defendant.

DEFENDANT HARRIS' EXPERT DISCLOSURE

Pursuant to this Court's order and Federal Rules of Criminal Procedure 16(b)(1)(C), Mr. Harris, through his attorney Julia A. Kelly, offers this disclosure of a forensic cell phone expert witness. ECF 347; PageID #2155. Mr. Harris intends to call Glenn Bard at trial and has attached his CV to this disclosure.

Mr. Bard is the Chief Technical Officer of PATCtech. He is a retired Pennsylvania State Trooper and U.S. Army Veteran of Operation Desert Storm. As a state trooper he began computer crime investigations and has conducted forensic examinations for city, state, and federal law enforcement agencies. He has been certified as an expert in state and federal courts in the area of digital forensics and cellular technology.

As part of the discovery received in this case, counsel was provided a drive of data collected from Mr. Harris' cell phone. Counsel intends to call Mr. Bard as an expert to testify to the data collected, the formatting of the discovery provided, and will interpret the information. Mr. Bard's testimony will rest on expert and specialized knowledge that will assist the trier of fact to understand the evidence.

Respectfully Submitted,

Date: February 4, 2022

WILLEY & CHAMBERLAIN LLP
Attorneys for Defendant Harris

/s/ Julia A. Kelly

Julia A. Kelly (P77407)

300 Ottawa Avenue, N.W., Suite 810
Grand Rapids, Michigan 49503
(616) 458-2212
jak@willeychamberlain.com